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MEMO ENDORSED

October 13, 2022

VIA ECF

Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 10-14-22

Re: *United States v. Yunseo Lee, et al.*
Case No.: 20-cr-648 (ALC)

Dear Judge Carter:

We are the attorneys for Yunseo Lee in the above-referenced matter and hereby submit this letter request to modify her bail conditions to (1) amend her travel restrictions to freely travel within New York and New Jersey; and (2) allow for non-work travel outside of her geographical travel limitations, within the continental U.S., with notice and permission from both Pretrial Services and the Government.

Currently, she is released on a \$200,000 PRB bond, with travel restricted within this District, the Eastern District of New York, and the District of New Jersey. She was also required to surrender her passport and submit to Pretrial Services supervision. On August 18, 2021, the Court granted Ms. Lee's request to terminate GPS monitoring. (Dkt. 47). On April 12, 2022, the Court granted Ms. Lee's request to modify the conditions of her release to permit business-related out-of-state travel, with permission from PTS. (Dkt 71). To date, Ms. Lee has been in full compliance with the terms and conditions of her release.

Recently, Ms. Lee has turned down a community event with her church because it was located outside of both this district and EDNY, in Ulster County of the Northern District of New York. Due to the proximity of these commonly made local trips, Ms. Lee is often not advised of the location until the event is quickly approaching. She would not be able to inquire about advanced notice without disclosing her current travel restrictions. The requested modification to her bail conditions would allow Ms. Lee the opportunity to attend not only community events with her church, but also team-building workshops with her colleagues.

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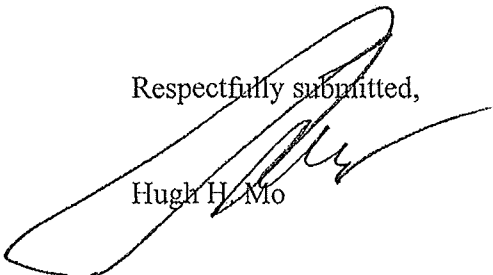
We are prompted to make this request at this time now due to a team-building workshop scheduled for tomorrow, of which PTS was unable to approve for travel because it is not within the scope of the last bail modification allowing for business-related work trips. Similar to her church community event, the team-building workshop is also located outside of her current travel restrictions in Ulster County, NDNY. Although a team-building workshop is not the equivalent of a work mandated business trip, it is still crucial to her professional success and reflects negatively upon Ms. Lee when everyone else, including the President of the Company, will be present and she is not. The ability to freely travel within the states of New York and New Jersey would greatly improve her ability to connect with her colleagues and church community because many off-site trips are out of the county, but reasonably within NY or NJ.

We have conferred with Pretrial Services and the Government and they have no objections to our request to amend Ms. Lee's travel restrictions to include the entirety of New York and New Jersey for her to freely travel within; and to allow for non-work related travel outside of her travel limitations within the continental U.S. so long as there is advanced notice and permission from both PTS and the Government.

Accordingly, we respectfully request the Court so ordered the modification of Ms. Lee's travel restrictions to amend her travel restrictions to allow her to freely travel within New York and New Jersey; and to allow for non-work related travel outside of her geographical travel limitations, within the continental U.S., with notice and permission from both PTS and the Government.

We thank the Court for its kind consideration.

Respectfully submitted,


Hugh H. Mo

The application is ☒ granted.

~~denied.~~


Andrew L. Carter Jr, U.S.D.J.

Dated: 10-14-22

NY, New York